

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRAN DINH TRUONG, individually and on behalf :
of ALPHONSE HOTEL CORP. d/b/a HOTEL :
CARTER, :

Plaintiff, :

- against - :

NEW YORK HOTEL & MOTEL TRADES :
COUNCIL, AFL-CIO, and THE OFFICE OF THE :
IMPARTIAL CHAIRMAN and PETER WARD, :

Defendants. :

----- X

Case No. 1:07-Civ-11383 (RJH)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Joel M. Silverstein dated April 8, 2008, and the Affirmation of Barry N. Saltzman previously submitted in Support of the Union's Motion for Judgment on the Pleadings and dated March 31, 2008 (Doc 30), The Office for the Impartial Chairman ("OIC"), will move before the Honorable Richard J. Holwell, U.S.D.J., at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007-1312, for and order imposing sanctions upon plaintiffs and their counsel pursuant to Fed. R. Civ. P. 11, including, without limitation, requiring them to reimburse OIC for the attorneys' fees and litigation expenses it has reasonably incurred in defending against plaintiffs' claims and in prosecuting this motion.

Dated: April 8, 2008

s/ Joel M. Silverstein
Herbert J. Stern (HS3169)
Joel M. Silverstein (JS5704)
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